### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

Case No. 1:19-cv-01301-WMR

LATASHA TRANSRINA KEBE and KEBE STUDIOS LLC,

Defendants.

#### JOINT MOTION FOR EXTENSION OF TIME

Plaintiff Belcalis Marlenis Almánzar ("Plaintiff") and Defendants Latasha Transrina Kebe and Kebe Studios LLC ("Defendants") submit this joint motion for an extension and provide as follows:

- 1. On July 26, 2021, this Court granted a motion for continuance and rescheduled the trial in this action from September 13, 2021 to November 9, 2021.
- 2. The parties jointly seek an extension of time to prepare and file the consolidated pretrial order in accordance with Local Rule 16.4 to October 7, 2021. The additional time will allow the parties to narrow the issues of disagreement and further streamline the trial.

- 3. The parties also jointly seek to extend the deadline for expert reports in accordance with Federal Rule 26(a)(2) to September 10, 2021.
- 4. The requested extensions of time will not affect any Court-ordered deadlines in this action or cause any delay in the scheduled trial dates.

Dated: August 10, 2021

#### /s/ Lisa F. Moore

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Attorneys for Plaintiff

Dated: August 10, 2021

/s/ Olga Izmaylova (with permission)

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Attorneys for Defendants

## **CERTIFICATION AS TO FONT**

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: August 10, 2021

/s/ Lisa F. Moore

Lisa F. Moore Georgia Bar No. 419633

# **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed on this date the foregoing JOINT MOTION FOR EXTENSION OF TIME with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

DATED: August 10, 2021

/s/ Lisa F. Moore

Lisa F. Moore

Georgia Bar No. 419633